

REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application and for courtesies extended during the Examiner Interview conducted on April 11, 2007.

Disposition of Claims

Claims 20-26, 28-39, and 41-43 are currently pending in this application. Claims 20, 32, and 43 are independent. The remaining claims depend, directly or indirectly, from claims 20 and 32.

Claim Amendments

The claims have been amended to recite that the working buffer is reserved for subtitle data *only* and that the graphics data is copied from a third buffer sub-area into the working buffer *after* obtaining a complete subtitle page in the working buffer. Applicant asserts that no new subject matter is added by way of these amendments. Support for these amendments may be found, for example, on page 16, lines 26-28 and page 17, lines 8-10 of the Specification.

Rejections under 35 U.S.C. § 103(a)

Claims 20-26, 28-39, and 41-43 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,801,782 ("Patterson") in view of U.S. Patent No. 5,519,450 ("Urbanus"). To the extent that this rejection may still apply to the amended claims, this rejection is respectfully traversed.

To establish a *prima facie* case of obviousness "...the prior art reference (or references when combined) must teach or suggest all the claim limitations." (See MPEP §2143.03). Further, "all words in a claim must be considered in judging the patentability of that claim against the prior art." (See MPEP §2143.03). The Applicant respectfully asserts that the references, when combined, fail to teach or suggest all the claim limitations of the independent claims.

As recited by the amended independent claims, and as discussed with the Examiner during the Examiner Interview conducted on April 11, 2007, the present invention relates to a method for displaying a complete image, which includes both graphics data and subtitle data, using multiple buffer sub-areas that are distinct from each other. Particularly, the working buffer is reserved for subtitle data only, so that a complete subtitle page can be obtained before graphics data is copied into the working buffer. The complete subtitle page and the graphics data are then combined just before the working buffer becomes the display buffer, so that the complete image is finally displayed (*see* Specification, Figure 5 and accompanying text on pages 16-18).

Turning to the rejection of the claims, the Examiner relies on Patterson to teach various buffers within the system for processing the received Video data and admits that Pattern fails to disclose the remaining limitations of the independent claims (*see* Office Action mailed November 30, 2007, page 3). However, the Examiner relies on Urbanus to teach or suggest the remaining limitations of the independent claims. Applicant respectfully disagrees.

As discussed with the Examiner during the Examiner Interview conducted on April 11, 2007, Urbanus fails to teach or suggest the following limitations of the independent claims:

(i) As recited by the amended independent claims, Urbanus fails to teach or suggest that the working buffer is reserved for incoming subtitle data *only* (see Specification, page 16, lines 26-28 and page 17, lines 8-10). The Examiner asserts that the frame buffer receives subtitle data from the LUT (look-up table) (13) shown in Figure 1 of Urbanus. However, as agreed to by the Examiner, by the time the frame buffer of Urbanus receives data from the LUT, the data includes both graphics data and subtitle data, not subtitle data alone. It is clear that the LUT in Urbanus mixes both the subtitle data from the graphics subdisplay unit and pixel data (graphics data) from the video signal (see Urbanus, Figure 1). Thus, Urbanus does not disclose a working buffer sub-area that is reserved only for subtitle data, as required by the amended independent claims.

(ii) It necessarily follows from point (i) above that Urbanus cannot possibly disclose “copying graphics data from a third buffer sub-area into the working buffer *after obtaining a complete subtitle page*.” As discussed with the Examiner, because Urbanus does not keep subtitle data and graphics data separate in the frame buffer (*i.e.*, graphics data and subtitle data are mixed together before being stored in the frame buffer), it is not possible for Urbanus to disclose “obtaining a complete subtitle page” which, by definition, includes only subtitle data (see Instant Specification, page 17). In fact, Urbanus is completely silent with respect to obtaining a complete subtitle page in the working buffer before graphics data is copied into the working buffer.

(iii) In addition, Urbanus fails to teach or suggest the limitation “wherein the graphics data is copied into the working buffer just before the working buffer becomes the display buffer.” Because Urbanus does not contemplate obtaining a complete subtitle page before

graphics data is copied into the working buffer, there is no need for Urbanus to teach copying in graphics data just before the interchanging of roles between the working buffer and the display buffer occurs. In fact, in Urbanus, it does not matter when the graphics data is transferred to the frame buffer, as the graphics data is already mixed in with subtitle data when it reaches the LUT (13) (*see* Urbanus, Figure 1).

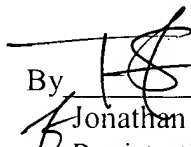
In view of the above, it is clear that amended independent claims 20, 32, and 43 are patentable over Patterson and Urbanus, whether considered separately or in combination. Further, dependent claims are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 11345/027001).

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Respectfully submitted,

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